



January 17, 2017

Richard Corey, Executive Officer  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95812

**RE: Draft Short-Lived Climate Pollutant Reduction Strategy**

Dear Mr. Corey:

The Rural County Representatives of California (RCRC) is an association of thirty-five California counties and the RCRC Board of Directors is comprised of elected supervisors from each of those member counties. RCRC member counties are tasked with a variety of decision-making responsibilities related to land use and development in rural California communities and are challenged with environmental stewardship, economic vitality, and social equity at the local level. We appreciate this opportunity to comment on the revised proposed Short-Lived Climate Pollutant (SLCP) Reduction Strategy (Strategy) and revised draft Environmental Analysis, particularly as they pertain to black carbon and methane emissions reductions.

Forest-Related Sources of Black Carbon Emissions

Much of California's forested lands are located within RCRC member counties including more than seventy percent of the lands managed by the USDA Forest Service. RCRC has long urged the State to address the escalating wildfire problem, particularly as temperatures rise and amplify the need for better forest management practices on both state and federal lands. Now, many rural forested counties are also grappling with the compounded risk of high severity wildfire due to the 102 million dead trees resulting from drought-induced tree mortality since 2010, which places the State in ongoing peril of experiencing year-round high severity wildfire.

RCRC acknowledges the work the State is doing on the Forest Carbon Plan to address the long-term carbon storage and emission goals from California's forest lands. We also appreciate the robust discussion of the forest sector in the 2030 Target Scoping Plan Discussion Draft and the commitment to a forest emissions inventory by December 2018. However, California's wildfire problem is getting worse each year, with the Strategy admitting that a vast majority of all black carbon emissions in California come from wildfires. We believe it is disingenuous and inappropriate to omit targets and goals from the Strategy based on the intent of Senate Bill 1383 (Lara), particularly since much of the State's wildfire

---

1215 K Street, Suite 1650, Sacramento, CA 95814 | [www.rcrcnet.org](http://www.rcrcnet.org) | 916.447.4806 | Fax: 916.448.3154

ALPINE AMADOR BUTTE CALAVERAS COLUSA DEL NORTE EL DORADO GLENN HUMBOLDT IMPERIAL INYO LAKE LASSEN MADERA MARIPOSA MENDOCINO MERCED  
MODOC MONO NAPA NEVADA PLACER PLUMAS SAN BENITO SAN LUIS OBISPO SHASTA SIERRA SISKIYOU SUTTER TEHAMA TRINITY TULARE TUOLUMNE YOLO YUBA

emissions are due to a long history of mismanagement of California's forested lands. As with past drafts, we strongly urge the Air Resources Board (ARB) to set goals for the forest sector to reduce emissions from high severity wildfire.

#### Reducing Methane Emissions

Reducing methane emissions from landfills has been the subject of GHG emissions reductions since ARB's Landfill Methane Control Measure, which was an early action measure from Assembly Bill 32. More recently, with the adoption of Assembly Bill 1826 (Chesbro, 2014), a commitment was made to divert commercial organics from landfills beginning in 2016, phasing implementation through 2019, with the goal of reaching 50 percent organic diversion from landfills in 2020. RCRC worked with the author's office, CalRecycle, and stakeholders to craft legislation that was feasible and reasonable, and supported the legislation. This legislation was enacted to help the state meet the statewide goal of 75 percent diversion of solid waste from landfills and would also serve to decrease additional methane emissions from landfills.

RCRC is pleased the Strategy now reinforces the goals in AB 1826 and SB 1383 for 50 percent of commercial organic diversion from landfills by 2020 and 75% by 2025, and maintains the ultimate goal of 40 percent reduction in methane emissions from the solid waste sector by 2030, as indicated on page 74 of the Strategy. We also appreciate the Strategy acknowledges that there is a need to improve understanding of emissions from landfills and landfill gas collection efficiencies before considering additional regulations to further control emissions from landfills in the future.

RCRC supports the actions to reduce GHGs in the solid waste sector, as outlined on pages 74 through 76 of the Strategy. Our member counties are committed to implementation of programs that will reduce GHG emissions to the extent they are economically feasible. Rural counties face additional challenges with the organic processing facility infrastructure in that current technology and the economies of scale often make their construction infeasible. RCRC strongly recommends that the emphasis to meet the methane emission reduction goals be on providing incentives and addressing challenges and issues associated with construction of the necessary infrastructure in California, and hope this emphasis is prioritized over additional mandatory programs.

If you should have any questions or would like to discuss our comments further, please contact me at (916) 447-4806 or [sheaton@rcrcnet.org](mailto:sheaton@rcrcnet.org).

Sincerely,

A handwritten signature in black ink, appearing to read "Staci Heaton", with a stylized flourish at the end.

STACI HEATON  
Regulatory Affairs Advocate

cc: Mary Nichols, Chair, California Air Resources Board  
RCRC Board of Directors